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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

WANGS ALLIANCE CORPORATION d/b/a  
WAC LIGHTING CO.,

Plaintiff,

v.

CAST LIGHTING LLC,

Defendant.

Case No: 2:20-cv-3710-MCA-MAH

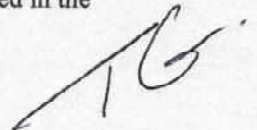
**DECLARATION OF TODD GOERS IN SUPPORT OF  
WANGS ALLIANCE CORPORATION'S OPPOSITION TO  
DEFENDANT CAST LIGHTING LLC'S MOTION TO STAY PROCEEDINGS**

I, Todd Goers, do hereby on oath depose and state as follows:

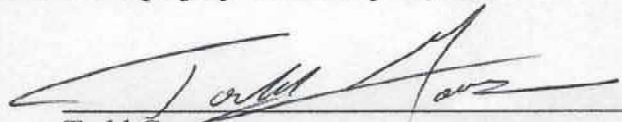
1. I am over 18 years of age, make this Declaration on the basis of my own personal knowledge, and am competent to testify on all matters set forth herein.
2. I am the National Sales Manager - Landscape Lighting for plaintiff Wangs Alliance Corporation d/b/a WAC Lighting Co. ("WAC").
3. I have an account/profile with the social media platform, Facebook. In addition to having my own Facebook account/profile, I am a member of an industry-focused Facebook Group called "Landscape Lighting," a Facebook Group that Facebook indicates consists of approximately 3,700 members. Based on my experience with postings in the Group, it is comprised of contractors, customers, vendors, and other players in the landscape lighting business.
4. On Thursday, January 14, 2021, I logged into my Facebook account. Scrolling through my account I saw a posting from a fellow member of the Landscape Lighting Group – "pushed" to my news feed – that concerned competing CAST and WAC products. The person posting the comparison is a landscape lighting contractor and thus a prospective customer. More troubling, the Landscape Lighting Group is extremely active, with lots of postings and comments, in precisely our target market. I was immediately concerned that posting would harm our brand and cost us customers longer term. Given how visible this post would be, I was upset and took a screen shot of it.
5. Attached hereto as Exhibit 6<sup>1</sup> is a true and accurate copy of the screen shot I captured of the posting, downloaded at the time and date stamped on its face.

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<sup>1</sup> I am using the number 6, instead of 1, because I understand my Declaration and this Exhibit will be used in the context of a brief with other previously-numbered exhibits.



Signed under the pains and penalties of perjury on January 22, 2021.



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Todd Goers